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## UNITED STATES DISTRICT COURT

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DISTRICT	OF MAINE (	PORTLAND	DIVISION)
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NATHAN REARDON,

Petitioner,

V.

UNITED STATES OF AMERICA,

Respondent.

Case No.: (to be assigned)

## MOTION TO TRANSFER VENUE TO PORTLAND DIVISION

NOW COMES the Petitioner, Nathan Reardon, respectfully requesting that this Honorable Court transfer the venue of this proceeding from the Bangor Division to the Portland Division of the United States District Court for the District of Maine, pursuant to 28 U.S.C. § 1404(a).

## **Grounds for Transfer:**

1. Venue transfer is warranted "for the convenience of parties and witnesses, in the interest of justice" under 28 U.S.C. § 1404(a).

- 2. The events underlying the due process and constitutional violations asserted by Petitioner are directly tied to media coverage and public perceptions highly localized in the Bangor Division.
- 3. Judge Lance E. Walker, who presided over Petitioner's sentencing and admitted on the record to being influenced by extrajudicial Bangor-area media, is seated in the Bangor Division.
- 4. Transfer to the Portland Division is necessary to:
  - Preserve the appearance and reality of impartial adjudication,
  - Shield proceedings from the localized media influence that has already tainted Petitioner's prior proceedings,
  - Ensure a fresh, fair, and unbiased judicial review.
- 5. No undue inconvenience to the parties would result from transfer to Portland, as both divisions are within the District of Maine.

## Relief Requested:

- Immediate transfer of this proceeding to the Portland Division,
- Assignment of a new judge not previously involved in Petitioner's criminal case.

Respectfully submitted,

Nathan Reardon

PO Box 52

Detroit, ME 04929